

THE CONTENTS OF THIS
DOCUMENT ARE THE HIGHEST
QUALITY OBTAINABLE

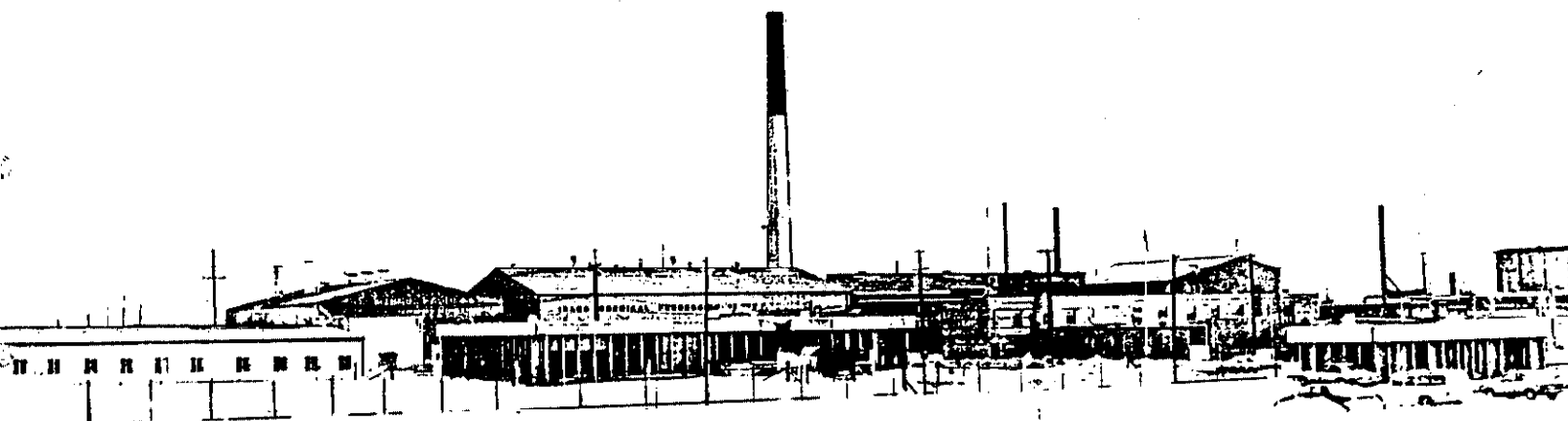
INITIAL *gj* DATE 10/21/92

REV 0
1992

TRACK 1 DECISION DOCUMENTATION PACKAGES OPERABLE UNIT 3-01

ORIGINAL SIGNATURES INCLUDED

- CPP-49 PCB TRANSFORMER YARD (CPP-705)**
- CPP-50 PCB TRANSFORMER YARD (CPP-731)**
- CPP-51 PCB STAGING AREA WEST OF CPP-660**
- CPP-61 PCB SPILL IN CPP-718 TRANSFORMER YARD**



**Westinghouse Idaho
Nuclear Company, Inc.**

Idaho Falls, Idaho 83403

Prepared For The

DEPARTMENT OF ENERGY

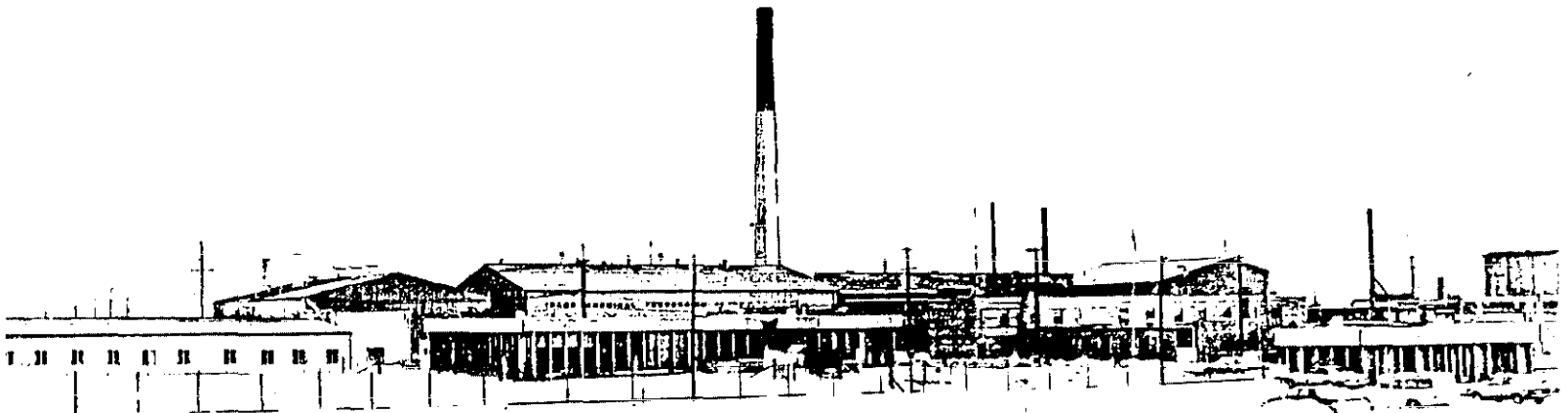
FIELD OFFICE, IDAHO UNDER CONTRACT DE-AC07-84ID12435

REV 0
1992

TRACK 1 DECISION DOCUMENTATION PACKAGES OPERABLE UNIT 3-01

ORIGINAL SIGNATURES INCLUDED

- CPP-49 PCB TRANSFORMER YARD (CPP-705)
- CPP-50 PCB TRANSFORMER YARD (CPP-731)
- CPP-51 PCB STAGING AREA WEST OF CPP-660
- CPP-61 PCB SPILL IN CPP-718 TRANSFORMER YARD



**Westinghouse Idaho
Nuclear Company, Inc.**

Idaho Falls, Idaho 83403

Prepared For The
DEPARTMENT OF ENERGY

FIELD OFFICE, IDAHO UNDER CONTRACT DE-AC07-84ID12435

**Track 1 Decision
Documentation Package**

**Waste Area Group 3
Operable Unit 3-01**

Site CPP-49

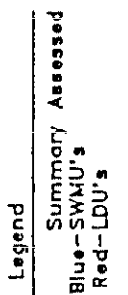
PCB Transformer Yard (CPP-705)

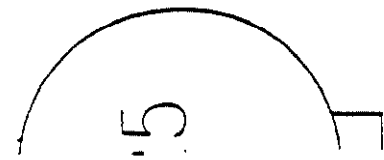


WAG 3 ENVIRONMENTAL RESTORATION PROJECT

NEI

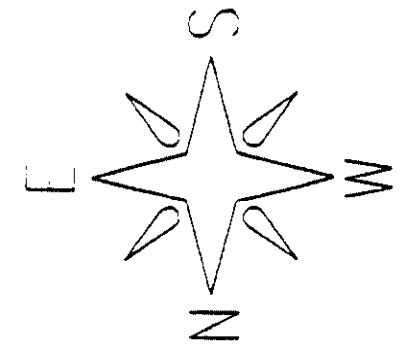
CPP Solid Waste Management Units





-UTI-
600

N 695,760
E 296,438



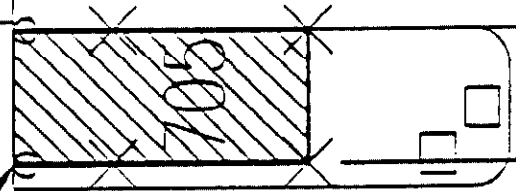
602

2

650

48'-5"

644



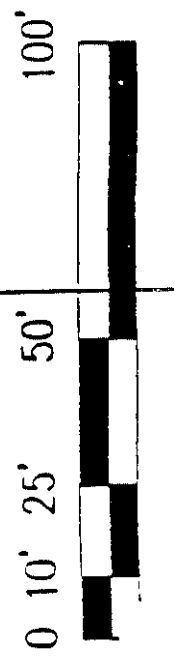
BIRCH STREET

ECA-CPP-49
ZONE C-7

676

602

22'



DECISION DOCUMENTATION PACKAGE
COVER SHEET

PREPARED IN ACCORDANCE WITH

TRACK 1 SITES:
GUIDANCE FOR ASSESSING
LOW PROBABILITY HAZARD SITES
AT INEL

SITE DESCRIPTION: PCB TRANSFORMER YARD (CPP-705)

SITE ID: CPP-49

OPERABLE UNIT: 3-01

WASTE AREA GROUP: 3

I. SUMMARY - PHYSICAL DESCRIPTION OF THE SITE: CPP-49 is the site of a transformer yard that contained three PCB containing transformers. The site is 30 ft by 60 ft in area. The transformers contained up to 330 ppm PCBs in transformer oil. Evidence of oil staining on concrete pads led to soil and concrete sampling during July, 1988. The soil sample results showed PCB concentrations of less than or equal to 1 ppm. There is a correction in the report that indicates the reported detection limit in the data sheets of 1 ppm is actually 0.1 ppm for all samples showing non-detectable PCB concentrations (It is also important to note that the 0.1 ppm PCB detection limit was also provided for composite samples and any single sample within the composite may have contained PCBs at above 0.1 ppm).

One concrete pad sample contained 29.1 ppm PCBs. Subsequent sealing activities, having been completed on the transformer pad, have resulted in encapsulation of the pad within a larger resultant concrete pad structure.

DECISION RECOMMENDATION

page 2

II. SUMMARY - QUALITATIVE ASSESSMENT OF RISK: The qualitative risk of the site is predicted by the risk assessment to be medium based on risk to groundwater. However, given the low concentrations of PCBs in the soil, the depth to groundwater and the very conservative assumptions used in the Track 1 risk assessment, there is little likelihood that groundwater will be impacted by PCBs. The reliability of the data is high.

III. SUMMARY - CONSEQUENCES OF ERROR: Limited risk due to low PCB concentrations of PCBs being left in the soil may result due to the no further action recommendation.

IV. SUMMARY - OTHER DECISION DRIVERS: The clean-up requirements provided for in the Toxic Substances Control Act (TSCA) 40 CFR 761.125 require remediation of PCBs in Industrial Areas to 25 ppm PCBs by weight in soil. The guidance provided in OWSER Directive 9335.4-01 "Guidance for Remedial Actions at Superfund Sites with PCB Contamination" also requires clean-up at restricted access industrial areas of 25 ppm PCBs by weight in soil. This clean-up requirement is based on health risk assessment criteria using occupational exposure of site workers by soil ingestion and dermal contact as the exposure scenario. Provided the established criteria in TSCA are considered an ARAR for the INEL, the existing soil concentrations can be left in place and no further action is recommended for this site. This ARAR, together with the very conservative assumptions used in performing the Track 1 risk assessment, provides for a reasonable foundation for recommending no further action at this site.

RECOMMENDED ACTION: No Further Action.

SIGNATURES**# PAGES:****DATE:**

Prepared By:

T. S. R. L.

DOE WAG Manager:

Approved By:

Independent Review:

DECISION STATEMENT
(BY DOE RPM)

page 3

DATE RECD: 4/17/82

DISPOSITION:

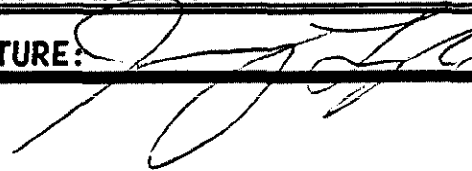
Composting reduced the levels to a
satisfactory level. No further action
required at this time. ROD will
include this source

DATE: 4/17/82

PAGES (DECISION STATEMENT):

NAME: JERRY LYCE

SIGNATURE:



DECISION STATEMENT
(BY EPA RPM)

page 4

DATE RECD: 4/9/92

DISPOSITION:

Although there may be individual samples which exhibited PCB concentrations above 25 ppm in soil due to compositing the initial concentration range of < 300 ppm and the composite sampling results support the conclusion of the July '88 Westinghouse report. Therefore, no further remedial investigative activities appear justified at this time. This source area determination will be incorporated in a future Record of Decision.

DATE: 4/17/92

PAGES (DECISION STATEMENT): 1

NAME: Wayne Pierce

SIGNATURE: Wayne Pierce

DECISION STATEMENT
(BY STATE RPM)

CPD-38 CPD-49 page 5

DATE RECD: 4/9/92

DISPOSITION:

Based on an evaluation of the data and the very low levels of PCB identified, this site does not pose an unacceptable risk to workers or any future residential population. This decision will be reviewed at the time of the Record of Decision.

DATE: 4/9/92

PAGES (DECISION STATEMENT):

NAME: Dean J. Hygard

SIGNATURE:

Dean J. Hygard

PROCESS/WASTE WORKSHEET

page 6

SITE ID CPP-49

Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
PCB Transformer Yard	Oil release to concrete transformer pads.	Artifact: Concrete Pad Location: CPP-49 Description: Possible PCB contamination
		Artifact: Location: Description:
		Artifact Location Description
Process PCB Transformer yard	Oil release to concrete transformer pads.	Artifact: Soil Location: CPP-49 Description: Possible PCB contamination
		Artifact Location Description
		Artifact Location Description
Process		Artifact Location Description
		Artifact Location Description
		Artifact Location Description

CONTAMINANT WORKSHEET

page 7

SITE ID CPP-49**PROCESS** (Col 1) PCB Containing Transformers**WASTE** (Col 2) PCB's

Col 4 What known/potential hazardous substances/constituents are associated with this waste or process?	Col 5 Potential sources associated with this hazardous material	Col 6 Known/estimated concentration of hazardous substances/constituents*	Col 7 Risk based concentration mg/kg	Col 8 Qualitative risk assessment (Hi/Med/Lo)	Col 9 Overall reliability (Hi/Med/Lo)
PCBs	Transformer Oil	≤330 ppm			
PCBs	Contaminated Concrete	29 ppm	0.0625 ppm	Med	Hi
PCBs	Contaminated Soil	≤1 ppm	0.0625 ppm	Med	Hi

a. ND = not detected

DL = detection limit in ppm

QUALITATIVE RISK AND RELIABILITY EVALUATION TABLE			
	QUALITATIVE RISK		
	Low	Medium	High
HIGHLY UN-RELIABLE	screening data	TRACK II	screening data
HIGHLY RELIABLE	No ACTION REQUIRED	RI/FS	INTERIM ACTION
reliability	LOW concentration resulting in risk < 10^{-6}	MEDIUM	HIGH concentration resulting in risk > 10^{-4}
	qualitative risk		

if there exist sufficient data to identify an appropriate remedy

Question 1. What are the waste generation process locations and dates of operation associated with this site?

Block 1 Answer:

This site was used as a transformer yard since 1951. The site is still correctly in use. The main transformer pad, 24 ft x 17.5 ft, contained oil stains containing PCBs.

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

As built drawings are dated 1951 and oil stains are documented in Occurrence Report # WINCO-91048.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Sampling of concrete and soil in 1988 shows PCB contaminated concrete and clean soil (≤ 1 ppm).

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ _____
 Anecdotal ☐ _____
 Historical process data ☐ _____
 Current process data ☐ _____
 Aerial photographs ☐ _____
 Engineering/site drawings ☐ _____
 Unusual Occurrence Report ☒ 1 _____
 Summary documents ☐ _____
 Facility SOPs ☐ _____
 OTHER ☒ 2,3 _____

Analytical data ☐ _____
 Documentation about data ☐ _____
 Disposal data ☐ _____
 Q.A. data ☐ _____
 Safety analysis report ☐ _____
 D&D report ☐ _____
 Initial assessment ☐ _____
 Well data ☐ _____
 Construction data ☐ _____

Question 2. What are the disposal process locations and dates of operation associated with this site?

Block 1 Answer:

The oil staining on the main concrete transformer pad was reported as an occurrence on 3/91. The staining had been observed prior to this time but was not reported. Sampling of the concrete and soil was completed in 1988. It is apparent that the concrete staining was due to PCB contaminated transformer oil from periodic maintenance or leaking of the transformer.

Block 2 How reliable is/are the information source/s? X High ___ Med ___ Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Occurrence Report # WINCO-91048 reports a leaking transformer and the sampling report from 1988 shows PCB contaminated concrete.

Block 3 Has this INFORMATION been confirmed? X Yes ___ No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Occurrence Report # WINCO-91048 reports a leaking transformer and the sampling report from 1988 shows PCB contaminated concrete.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information [] _____
 Anecdotal [] _____
 Historical process data [] _____
 Current process data [] _____
 Aerial photographs [] _____
 Engineering/site drawings [] _____
 Unusual Occurrence Report [] _____
 Summary documents [] _____
 Facility SOPs [] _____
 OTHER (X) 1,2 _____

Analytical data [] _____
 Documentation about data [] _____
 Disposal data [] _____
 Q.A. data [] _____
 Safety analysis report [] _____
 D&D report [] _____
 Initial assessment [] _____
 Well data [] _____
 Construction data [] _____

Question 3. Is there empirical, circumstantial, or other evidence of migration?
If so, what is it?

Block 1 Answer:

No. There is no evidence of migration from the transformer yard. Oil staining to the concrete appeared to be limited. Sampling confirmed PCB contaminated concrete and clean soil (≤ 1 ppm).

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Occurrence Report #WINCO-91048 verifies limited leakage and the sampling report (1988) shows limited impact to soils (≤ 1 ppm).

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Occurrence Report #WINCO-91048 and September 1988 Sampling Report.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ _____
Anecdotal ☐ _____
Historical process data ☐ _____
Current process data ☐ _____
Aerial photographs ☐ _____
Engineering/site drawings ☐ _____
Unusual Occurrence Report ☐ _____
Summary documents ☐ _____
Facility SOPs ☐ _____
OTHER ☒ 1,2 _____

Analytical data ☐ _____
Documentation about data ☐ _____
Disposal data ☐ _____
Q.A. data ☐ _____
Safety analysis report ☐ _____
D&D report ☐ _____
Initial assessment ☐ _____
Well data ☐ _____
Construction data ☐ _____

Question 4. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.

Block 1 Answer:

The PCB containing transformer (XRF-PHE-22) on the main pad will be removed during 1992. The PCB contaminated concrete pad was encapsulated during 1991 with a new pad and the new pad was sealed to prevent moisture migration to the existing pad and soil. One additional PCB containing transformer (HCE-323) is being removed from the yard during 1992.

Block 2 How reliable is/are the information source/s? X High ___Med ___Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Occurrence Report #WINCO-91048 and interview with Plant Projects.

Block 3 Has this INFORMATION been confirmed? X Yes ___No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Occurrence Report #WINCO-91048 and interview with Plant Projects.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ _____
 Anecdotal ☐ _____
 Historical process data ☐ _____
 Current process data ☐ _____
 Aerial photographs ☐ _____
 Engineering/site drawings ☐ _____
 Unusual Occurrence Report ☐ _____
 Summary documents ☐ _____
 Facility SOPs ☐ _____
 OTHER ☒ 1,2 _____

Analytical data ☐ _____
 Documentation about data ☐ _____
 Disposal data ☐ _____
 Q.A. data ☐ _____
 Safety analysis report ☐ _____
 O&O report ☐ _____
 Initial assessment ☐ _____
 Well data ☐ _____
 Construction data ☐ _____

Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?

Block 1 Answer:

The pattern of contamination on the concrete pad is shown on Figure 3 of the September, 1988 Sampling Report. Soil contamination concentrations were ≤ 1 ppm. It is important to note that the field sampling methodology did not always adhere to the Quality Assurance Project Plan (QAPP) for the project. Differences included: no available documentation that Enviro Search completed independent validation of the sampling results, deep samples dictated by the QAPP, collection of discrete samples rather than composite samples, etc.

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

September, 1988 Sampling Report.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

September, 1988 Sampling Report.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	<input type="checkbox"/>	_____
Anecdotal	<input type="checkbox"/>	_____
Historical process data	<input type="checkbox"/>	_____
Current process data	<input type="checkbox"/>	_____
Aerial photographs	<input type="checkbox"/>	_____
Engineering/site drawings	<input type="checkbox"/>	_____
Unusual Occurrence Report	<input type="checkbox"/>	_____
Summary documents	<input type="checkbox"/>	_____
Facility SOPs	<input type="checkbox"/>	_____
OTHER	<input checked="" type="checkbox"/>	2,3

Analytical data	<input type="checkbox"/>	_____
Documentation about data	<input type="checkbox"/>	_____
Disposal data	<input type="checkbox"/>	_____
Q.A. data	<input type="checkbox"/>	_____
Safety analysis report	<input type="checkbox"/>	_____
D&D report	<input type="checkbox"/>	_____
Initial assessment	<input type="checkbox"/>	_____
Well data	<input type="checkbox"/>	_____
Construction data	<input type="checkbox"/>	_____

Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.

Block 1 Answer:

Two areas of concrete staining were apparent on the concrete transformer pad; one at the northeast corner and one at the southwest corner. The total area of affected concrete was less than 50 square feet. The concrete has been encapsulated and sealed against release to the environment.

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

September, 1988 Sampling Plan (Figure 3).

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

September, 1988 Sampling Plan (Figure 3).

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ _____
 Anecdotal ☐ _____
 Historical process data ☐ _____
 Current process data ☐ _____
 Aerial photographs ☐ _____
 Engineering/site drawings ☐ _____
 Unusual Occurrence Report ☐ _____
 Summary documents ☐ _____
 Facility SOPs ☐ _____
 OTHER ☒ 2 _____

Analytical data ☐ _____
 Documentation about data ☐ _____
 Disposal data ☐ _____
 Q.A. data ☐ _____
 Safety analysis report ☐ _____
 D&D report ☐ _____
 Initial assessment ☐ _____
 Well data ☐ _____
 Construction data ☐ _____

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.

Block 1 Answer:

Estimate of PCB weight based on stained area of 50 sq.ft., 1" penetration and concrete density of 130 lbs/ft³.

$$50 \text{ sq. ft} \times \left(\frac{1}{12}\right) \text{ ft} \times \frac{130 \text{ lbs}}{\text{ft}^3} \times \frac{454 \text{ gm}}{1 \text{ lb}} \times \frac{29.1 \text{ parts PCB}}{10^6 \text{ parts concrete}}$$

$$= 7.15 \text{ gm PCBs}$$

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Estimate based on concrete staining and concentration from Sampling Report.

Block 3 Has this INFORMATION been confirmed? ☐ Yes ☒ No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Estimate based on concrete staining and concentration from Sampling Report.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ _____
 Anecdotal ☐ _____
 Historical process data ☐ _____
 Current process data ☐ _____
 Aerial photographs ☐ _____
 Engineering/site drawings ☐ _____
 Unusual Occurrence Report ☐ _____
 Summary documents ☐ _____
 Facility SOPs ☐ _____
 OTHER ☒ 2 _____

Analytical data ☐ _____
 Documentation about data ☐ _____
 Disposal data ☐ _____
 Q.A. data ☐ _____
 Safety analysis report ☐ _____
 D&D report ☐ _____
 Initial assessment ☐ _____
 Well data ☐ _____
 Construction data ☐ _____

Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.

Block 1 Answer:

Yes. According to the sampling report, PCB contaminated concrete is still present at the site. The concrete has been encapsulated with a new concrete pad which is sealed. Remaining PCB containing transformers (two) will be removed during 1992.

Block 2 How reliable is/are the information source/s? X High ___Med ___Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

September 1988 Report and Occurrence Report.

Block 3 Has this INFORMATION been confirmed? X Yes ___No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

September 1988 Report and Occurrence Report.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ _____
 Anecdotal ☐ _____
 Historical process data ☐ _____
 Current process data ☐ _____
 Aerial photographs ☐ _____
 Engineering/site drawings ☐ _____
 Unusual Occurrence Report ☐ _____
 Summary documents ☐ _____
 Facility SOPs ☐ _____
 OTHER ☒ 1.2 _____

Analytical data ☐ _____
 Documentation about data ☐ _____
 Disposal data ☐ _____
 Q.A. data ☐ _____
 Safety analysis report ☐ _____
 D&D report ☐ _____
 Initial assessment ☐ _____
 Well data ☐ _____
 Construction data ☐ _____

REFERENCES

1. Off-Normal Occurrence Report Number WINCO-91048.
2. Final Report, :PCB Soil Sampling in the Transformer Yard (CPP-705), Idaho Chemical Processing Plant", Westinghouse Idaho Nuclear Company, Inc., July 1988.
3. Quality Assurance Sampling Plan, September 1988.
4. EG&G Risk Evaluation, January 1992.

REFERENCE 1

OCCURRENCE REPORT
IDAHO CHEMICAL PROCESSING PLANT
Westinghouse Idaho Nuclear Company, Inc.

49

Name: J. M. White Title: Plant Shift Manager Phone No.: 8-583-3100
(Facility Manager)
Name: G. K. Oswald Title: Plant Services Manager Phone No.: 8-583-3263
(Responsible Manager)
Name: K. M. Coburn Title: Utilities Manager Phone No.: (208) 526-3306
(Originator)

1. Occurrence Report Number: WINCO-91048

2. Status: Report Date: 3. Occurrence Category:
[] Notification 3-19-91 [] Emergency
[x] 10 - day 3-22-91 [] Unusual Occurrence
[] Final [x] Off-Normal

4. Responsible Department(s): Production

DOE Program Office: DP-14

5. Facility or Location: CPP-705 6. Plant Area: ICPP
System: Electrical Utilities
Equipment/ID: Transformer XFR-PHE-22

7. Date of Occurrence (Discovered): 3-7-91 Time: 1430

8. Date of Occurrence Categorized: 3-19-91 Time: 1240

9. Date of DOE Program Notification: 3-19-91 (DOE-ID) Time: 1240

10. Date of Other Notification: 3-19-91 Time: 0900

State of Idaho INEL Oversight Program

11. Subject or Title of Occurrence:

PCB Contaminated Oil Leak to the Environment

12. Description of Occurrence:

Environmental assurance personnel perform periodic inspections of ICPP transformers that contain PCBs. During one of these inspections, on 3-7-91, a small amount of oil had leaked from XFR-PHE-22. The amount of leak is estimated to be 10 milliliters, a small portion of which actually went to soil. PCB concentration in the oil 50 ppm.

(NOTE: The fact that the incident qualified to be reported as an offnormal occurrence was not realized until 3-19-91.)

13. Operating Conditions of Facility at Time of Occurrence:

This transformer is in use.

14. Immediate Actions Taken and Results:

- 1) The oil and the contaminated soil were cleaned up and disposed of.

Report Date: 3-22-91

15. Cause:Direct Cause: (mark only one)Design ☒ Material ☐ Personnel ☐ Procedure ☐ Other ☐
Explain:Contributing Cause(s):Design ☐ Material ☐ Personnel ☐ Procedure ☐ Other ☐
Explain:Root Cause:Design ☐ Material ☐ Personnel ☐ Procedure ☐ Management ☐
Training ☐
Explain:

16. Description of Cause:Direct Cause:

The metal to metal seal failed around indicating gauge connections to the transformer tank, thus allowing transformer oil to slowly weep from connections.

Contributing and root causes will be addressed in the final report, based on the results of the investigation.

17. Evaluation:

The slow weeping of the transformer oil from around the indicating gauge connections will not endanger the safe operation of the transformer. The transformer is located inside SWMU 49 which is fenced in. Personnel must intentionally enter SWMU 49 to come in close proximity with XFR-PHE-22. Therefore, PCB contamination risk to personnel is minimal.

18. Is Further Evaluation Required: Yes ☒ No ☐If Yes, Before Further Operation: Yes ☐ No ☒

If Yes, By Whom? _____ When? _____

Occurrence Report Number: WINCO-91048

Report Date: 3-22-91

19. Corrective Action: Taken: ☒ Recommended: ☐ To Be Supplied: ☒

Taken:

See Block 14 for corrective action 1.

To Be Supplied:

2) Work has been initiated to apply a sealant material around the area that had been leaking as a precaution. (No leakage has been observed in this area since initial cleaning.)

3) Project S299256 has scheduled removal of XFR-PHE-22 in July 1991.

Further corrective actions will be formulated on the results of the investigation and reported in final report.

20. Impact on Environment, Safety and Health:

Will be reported in final report

21. Programmatic Impact:

None

22. Impact Upon Codes and Standards:

None

23. Final Evaluation and Lessons Learned:

Will be reported in final report

24. Similar Occurrence Report Numbers:

None

25. Signatures:

Not required

UCM Review

(Name, Position)

Date:

S. K. Oswald
Responsible Manager

Plant Services Manager
(Name, Position)

Date: 3/21/91

Chm Whit for S. Gearhart
Chairman, SRC Committee

(Name, Position)

Date: 3/22/91

Chm Whit
Facility Manager

Shift Manager
(Name, Position)

Date: 3/22/91

(Signed by) C. R. Enos
DOE-10 Facility Representative

Chief, CPP Branch
(Name, Position)

Date: 3-25-91

DOE-nd Program Manager

(Name, Position)

Date:

Occurrence Report Number: WINCO-91048

Report Date: 3-22-91

DOE FACILITY REPRESENTATIVES INPUT

26. DOE Facility Representative Input:

1. Why was the state of Idaho notified before DOE?
2. Block #15 - Do not leave contributing and root causes blank.
3. Block #17 - A description of SWMU 49 should be included.
4. Action should be taken to ensure any leakage will be contained in a secondary containment until the transformer can be removed.
5. It is my understanding that this transformer has weeped PCB solution in the past. How long has this condition been known and what corrective action has been taken in the past?

COMMENTS TO BE INCORPORATED INTO THE FINAL REPORT BEFORE IT IS ISSUED.

27. Entered By: (Signed by) C. R. Enos
(Name of DOE Facility Representative)

Date: 3-26-91